

Exhibit 17

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

**IN RE: VALSARTAN PRODUCTS
LIABILITY LITIGATION**

CIVIL ACTION NUMBER:

19-md-02875-RBK-JS

STATUS CONFERENCE

Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, New Jersey 08101
August 14, 2019
Commencing at 2:09 p.m.

B E F O R E:

**THE HONORABLE JOEL SCHNEIDER,
UNITED STATES MAGISTRATE JUDGE**

A P P E A R A N C E S:

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Proceedings recorded by mechanical stenography; transcript
produced by computer-aided transcription.

1 you don't have the kind of documents you think would give you
2 that, we'll respond in connection with the document requests.
3 That may be the best thing to do. In terms of -- you know, we
4 haven't crossed the bridge in this case yet whether 30(b)(6)
5 depositions or informal interviews, that issue hasn't
6 been handled --

7 THE COURT: No, it hasn't.

8 MR. GOLDBERG: I mean, we're trying to propose a
9 process where we can hopefully avoid even getting to that
10 bridge.

11 THE COURT: We may differ on this, but it seems to me
12 that a defendant should take the first cut at the custodians
13 and the plaintiffs should take the first cut at the search
14 terms.

15 MR. SLATER: That's fine.

16 THE COURT: Because you know what you're looking for.

17 MR. SLATER: We have some idea.

18 And then, also, it may be helpful -- we're obviously
19 going to ask for a lot of different corporate organizational
20 charts in a formal way in the discovery requests. It would be
21 helpful, when they provide us the proposed custodians, to
22 provide those work charts that they do have, or at least
23 something that lays out how the company --

24 THE COURT: Internal, as opposed to what you have
25 agreed to exchange, sort of the corporate-wide organization?

1 MR. SLATER: Correct, correct. And we are obviously
2 going to formally request things, you know, like corporate
3 organization of the company and then -- you know, in different
4 departments, medical affairs or clinical affairs, you know,
5 the different quality assurance departments, all the
6 departments that we relate, but to the extent they have that
7 information, it may not be something we have to wait for the
8 discovery requests to be formalized before we get that. We
9 would just ask that they start giving that to us because,
10 again, then we can understand what is it that we're looking
11 for, what's the vocabulary of the different departments, and
12 then when we do finally get to the point of being able to have
13 a candid interaction, we can say, well, you know, what did
14 this department do? Was testing done by this department? Who
15 were the people in charge? Who were doing the inspections?
16 Who were -- you know, who were crystallizing -- the obvious
17 questions, and we can at least understand the structure that
18 we're discussing.

19 THE COURT: Let me ask you a question. At least for
20 the moment, are we dealing with the two categories of
21 defendants that were identified in the Core Discovery Order?
22 We're not waiving any right to take discovery -- document
23 requests regarding the wholesalers, retailers, those people,
24 but are we focussing on those two categories, the API people
25 and the finished product people?